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UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION

LAWYERS' COMMITTEE FOR CIVIL
 RIGHTS OF THE SAN FRANCISCO BAY
 AREA,

Plaintiff,

vs.

DEPARTMENT OF HOMELAND
 SECURITY and UNITED STATES
 IMMIGRATION AND CUSTOMS
 ENFORCEMENT,

Defendants.

Case No. 3:24-cv-09330-TSH

**JOINT PRODUCTION PROPOSAL AND
~~PROPOSED~~ ORDER**

1 Pursuant to the Court's May 28, 2025 Order, Dkt. No. 22, the Parties to the above-
2 entitled action respectfully submit this Joint Production Proposal and Proposed Order.

3 On June 10, 2025, the Parties met and conferred regarding (1) the scope and timing of the
4 United States Immigration and Customs Enforcement's ("ICE" or the "Agency") production of
5 audio/video files and (2) appropriate deadlines for Defendants' assessment of GEO's exemption
6 claims. The Parties have agreed to the following production schedule:

7 **I. Document Production and GEO Exemption Claims:**

8 a. On or about June 20, 2025, ICE will make an interim document production of
9 remaining documents responsive to LCCRSF's FOIA request, including redactions reflecting
10 GEO's objections and withholdings provided in response to ICE's submitter's notice, in addition
11 to ICE's exemption claims. The June 2025 document production is being made to expedite
12 LCCRSF's access to documents.

13 b. By July 15, 2025, LCCRSF will notify ICE of any anticipated objections to the
14 withholdings asserted by ICE in its June 2025 interim production.

15 c. If, after review of Plaintiff's anticipated objections, ICE determines that issuance
16 of a notice of intent to release is appropriate, it will issue such a notification to its contractor,
17 GEO, by August 29, 2025. ICE will request a response from GEO by a date certain (*e.g.*, 10 or
18 20 business days).

19 d. If appropriate, ICE will make a supplemental production of documents with
20 appropriate withholdings lifted. But subject to potential supplemental productions, ICE currently
21 expects the June 2025 interim release to be the final production of documents responsive to
22 LCCRSF's FOIA request.

23 e. But for any withholdings lifted by ICE as a result of the above outlined agreement,
24 discussion regarding additional objections to the withholdings asserted will occur after the
25 Agency has produced all records responsive to LCCRSF's FOIA request.

1 **II. ICE Production of Audio/Video:**

2 a. ICE estimates that in response to LCCRSF's FOIA request, GEO has furnished it
3 with approximately 6–8 hours of video footage.

4 b. ICE agrees to review and process video files responsive to LCCRSF's FOIA
5 request. Subject to resource limitations based on concurrent document production, ICE agrees to
6 review approximately thirty (30) to forty (40) minutes of video each month, with productions
7 being made on a rolling basis on or about the fifteenth (15th) of each month. For instance,
8 LCCRSF acknowledges that ICE will release a partial production of video in any month (*i.e.*,
9 August 2025; and in approximately October 2025, as the Agency may make a supplemental
10 document production based on GEO's response to the potential notice of intent to release) where
11 extensive agency resources are dedicated to document review, such as any month that will also
12 include a supplemental document release.

13 c. ICE will prioritize its review of video as follows: (a) body cam footage; (b)
14 dormitory footage; and (c) hallway footage.

15 d. ICE's first production will be made on or about July 15, 2025, and ICE currently
16 estimates that it will take approximately up to ten months to complete its production.

17 Dated: June 12, 2025

Respectfully submitted,

NIXON PEABODY LLP

By: /s/ Brock J. Seraphin

Matthew A. Richards

Brock J. Seraphin

Attorneys for Plaintiff

22 Dated: June 12, 2025

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United States Attorney

By: /s/ Christopher F. Jeu

Christopher Jeu

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Attorneys for Federal Defendants
Department of Homeland Security and
U.S. Immigration and Customs
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~~PROPOSED~~ ORDER

The above PRODUCTION PROPOSAL & PROPOSED ORDER is approved for this case and all parties shall comply with its provisions. The Court shall conduct a case management conference on July 16, 2026 at 10:00 a.m. The parties shall file an updated case management statement by July 9, 2026.

IT IS SO ORDERED.

Dated: June 20, 2025



THOMAS S. HIXSON
UNITED STATES MAGISTRATE JUDGE